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7	Attorneys for United States of America	
8	UNITED STATES DISTRICT COURT	
9	DISTRICT OF NEVADA	
10	Amada Magdalena Gutierrez-Lopez and Yohandi Perez-Esquivel,	Case No. 2:23-cv-00933-GMN-DJA
11	Plaintiffs,	Official and an analogue of Figure 1
12	,	Stipulation and Order to Extend Dispositive Motions and Proposed
13	V. United States of America,	Joint Pre-Trial Order Deadlines
14		
15	Defendant.	
16	Pursuant to Fed R. Civ. P. 6(b)(1) and LR IA 6-1, the parties hereby stipulate and	
17	agree as follows:	
18	Discovery concluded on January 22, 2025. ECF No. 32.	
19	The current deadline to file dispositive motions is February 21, 2025. <i>Id.</i> The current	
20	deadline to file a proposed joint pre-trial order ("JPTO") is March 24, 2025, or thirty days	
21	after the Court's decision on dispositive motions. <i>Id.</i>	
22	This stipulation is filed at least 10 days before the settlement conference. ECF No.	
23	37.	
24	On January 28, 2025, counsel for Plaintiffs and counsel for the United States agreed	
25	to an extension of the deadline to file dispositive motions to <b>April 11, 2025</b> , and an	
26	extension of the deadline to file a proposed JPTO to May 12, 2025 (or thirty days after the	
27	Court's decision on dispositive motions). This extension is necessary because both parties	
28	feel that the deadline to submit dispositive motions should occur after the settlement	

conference currently scheduled for March 12, 2025, in case the settlement conference leads 1 to a resolution of this matter. 2 The parties intended to file this stipulation on January 31, 2025, which would have 3 4 been at least 21 days before the earliest deadline to be extended (dispositive motions deadline), but because of the parties' workload they were unable to file until today, February 5 3, 2025. 6 This is the first request to specifically extend the dispositive motions and proposed 7 JPTO deadlines, and the fourth request for those deadlines to be extended generally. 8 9 This request for an extension of time is sought in good faith and not for any improper purpose including delay. 10 Respectfully submitted this 3rd day of February 2025. 11 12 SUE FAHAMI CRAIG P. KENNY & ASSOCIATES 13 Acting United States Attorney <u>/s/ Lawrence E. Mittin</u>
LAWRENCE E. MITTIN, ESQ. 14 Nevada Bar No. 5428 /s/ Virginia T. Tomova 501 S. 8th Street 15 VIRGINIA T. TOMOVA Las Vegas, Nevada 8910 Assistant United States Attorney 16 Attorneys for Plaintiffs Attorneys for United States of America 17 GUTIERREZ-LOPEZ and ESQUIVEL 18 IT IS SO ORDERED: 19 20 21 UNITED STATES MAGISTRATE JUDGE 22 2/4/2025 DATED: \_\_ 23 24 25 26 27 28